

**To:** LaBoda, Sarah[LaBoda.Sarah@epa.gov]  
**Cc:** Peterson, Bill[Peterson.Bill@epa.gov]; Loeb, Elizabeth (ENRD)[Elizabeth.Loeb@usdoj.gov]; John D. Ditmore (jdditmore@cvrenergy.com)[jdditmore@cvrenergy.com]; Janice T. DeVelasco (jtdevelasco@CVREnergy.com)[jtdevelasco@CVREnergy.com]; Bob Morris (rmorris@CVREnergy.com)[rmorris@CVREnergy.com]; Zoppo, David R. (Perkins Coie)[DZoppo@perkinscoie.com]  
**From:** Johnson Koch, LeAnn M. (Perkins Coie)  
**Sent:** Tue 9/27/2016 5:17:05 PM  
**Subject:** RE: CRRM Sulfur Testing Protocols

Sarah –

Following up on my voicemail last week and Bill's email below. I would like to discuss a path forward for testing for the TRS monitors because we would like to do the testing of the H2S and TRS monitors at the same time. The Test Order (paragraphs 9 and 15) requires CRRM to submit a protocol to perform a RATA using the test methods and procedures according to 60.107a(e)(1)(ii). **Ex. 7(a)** CRRM submitted protocol to perform cylinder gas audits on September 12, which is one of the approved procedures in 60.17a(e)(1)(ii).

Can we schedule a call to discuss a path forward?

Thanks,

LeAnn

**From:** Peterson, Bill [mailto:Peterson.Bill@epa.gov]  
**Sent:** Tuesday, September 13, 2016 7:53 AM  
**To:** Johnson Koch, LeAnn M. (WDC)  
**Cc:** LaBoda, Sarah; Loeb, Elizabeth (ENRD); Bromer, Alexandra Magill (WDC); Janice T. DeVelasco (jtdevelasco@CVREnergy.com); Bob Morris (rmorris@CVREnergy.com); Zoppo, David R. (MSN); Foley, Patrick  
**Subject:** RE: CRRM Sulfur Testing Protocols

LeAnn,

The TRS monitors need to follow the July 25, 2016, Order to Test. A RATA is required for both of the TRS monitors as well. Please refer to EPA's correspondence dated 9/8/2016. If you have any questions, please contact Sarah

LaBoda directly.

Regards,

Bill Peterson

EPA Region 7

(913) 551-7881

**From:** Johnson Koch, LeAnn M. (Perkins Coie) [<mailto:LeAnnJohnson@perkinscoie.com>]

**Sent:** Thursday, September 01, 2016 7:48 PM

**To:** Peterson, Bill <[Peterson.Bill@epa.gov](mailto:Peterson.Bill@epa.gov)>

**Cc:** LaBoda, Sarah <[LaBoda.Sarah@epa.gov](mailto:LaBoda.Sarah@epa.gov)>; Loeb, Elizabeth (ENRD) <[Elizabeth.Loeb@usdoj.gov](mailto:Elizabeth.Loeb@usdoj.gov)>; Bromer, Alexandra Magill (Perkins Coie) <[ABromer@perkinscoie.com](mailto:ABromer@perkinscoie.com)>

**Subject:** CRRM Sulfur Testing Protocols

Hi Bill –

We intended to respond to the RATA request for the TRS monitors as well. We were discussing whether it should be included in the protocols or the response and it ended up in neither. Apologies for the oversight.

Ex. 7(a)

We are collecting the last few daily calibration checks requested in 2.e., 3.d., 5.e., and 6.d. and will send those shortly. We will add the RATA/CGA information above to that response unless you prefer that we update the protocols to include the CGAs.

If you have any additional questions concerning the 114 response or test order, please contact me directly.

Thanks,

LeAnn

**LeAnn Johnson Koch | Perkins Coie LLP**

202.654.6209 (office)

Ex. 6 - Personal Privacy (mobile)

**From:** Peterson, Bill [<mailto:Peterson.Bill@epa.gov>]  
**Sent:** Tuesday, August 30, 2016 2:15 PM  
**To:** Develasco, Janice T.; Morris, Bob Morris  
**Cc:** Christian, Tamara B.  
**Subject:** CRRM Sulfur Testing Protocols

Janice,

I was provided a download link (LeapFile website) from Perkins Coie which contained attachments in a zip file. This was in response to the most recent 114 Information Request from EPA Region 7. It stated that the testing protocols were in Attachment E. I found two protocols, which are attached to this email. The

protocols contain testing procedures for H<sub>2</sub>S (as required in the Order to Test Section of the 114 letter), but did not contain RATA testing for the Total Reduced Sulfur CEMS, also required by the Test Order (see questions #9 and #21 of "Section II Order to Test").

Was there supposed to be another set of testing protocols for the TRS CEMS at both the Coker and Cold Pond flares available for download? Was this an oversight on either my part (I failed to download all files or missed something in the attached protocols) or by CRRM? Or was it CRRM's intent not to provide RATA testing protocols for TRS? If you or someone from CRRM could let me know, I would appreciate it. Please note that if I approve the H<sub>2</sub>S portion of the testing and then later approve the TRS testing, your tester may have to mobilize to the refinery on two separate dates.

Respectfully,

Bill Peterson

EPA Region 7

(913) 551-7881

---

NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

---

NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.